

March 8, 2005

John Robertus Executive Officer San Diego Regional Water Quality Control Board 9174 Sky Park Court, Suite 100 San Diego, CA 92123

SUBJECT: San Onofre Nuclear Generating Station NPDES Permit Renewal

Dear Mr. Robertus:

I want to write to make a few comments in respect to the San Onofre Nuclear Generating Station NPDES permit renewals. San Onofre is a valuable asset to our community and provides electricity to over two million homes in Southern California. The station does this with a good compliance record, especially in respect to environmental issues. The plant has had very few NPDES violations over the past few years, and the minimal impact from the discharge of the plant is being mitigated under a California Coastal Commission permit. The plant is also a clean source of electricity, resulting in very little water and air pollution. The station also supports the local community with many outreaches and contributions to non-profit organizations.

In respect to this NPDES permit renewal, we request that San Onofre not be burdened any more than any other major discharger on the Southern California coast. One particular area of concern is the fact that SONGS has separate NPDES permits for both Units 2 and 3. This is not the case for other generating stations with multiple outfalls in other regions in Southern California. The result is SCE (and ultimately the ratepayer) paying much higher annual NPDES permit fees than other generating stations on the Southern California coast. Two separate NPDES permits for the station results in additional annual permit fees of \$161,000. This is unfair, unreasonable, and should be corrected by issuing one NPDES permit for the entire station.

In conclusion, we respectfully request that you issue the NPDES permit for San Onofre with the above modification. Thank you for your attention.

Sincerely,

Patti Krebs

Executive Director

Patti Krebs

Cc: Members of the Regional Board